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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 v.

11 SPAR BILICKI ET AL,

12 Defendant.

Case No. 2:21-cr-00102-JCM-VCM

**STIPULATION TO CONTINUE
PRETRIAL MOTIONS**
(Third Request)

13
14 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher
15 Chiou, Acting United States Attorney, and Allison Reese, Assistant United States Attorney,
16 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
17 and Raquel Lazo, Assistant Federal Public Defender, counsel for Spar Bilicki, and
18 Maysoun Fletcher, counsel for Brenda Contreras, that the parties herein shall have to
19 and including November 8, 2021, to file any and all pretrial motions and notices of defense.

20 IT IS FURTHER STIPULATED AND AGREED, that the parties herein shall have to and
21 including November 22, 2021, to file any and all responsive pleadings.

22 IT IS FURTHER STIPULATED AND AGREED, that the parties herein shall have to and
23 including November 29, 2021, to file any and all replies to dispositive motions.
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1 The Stipulation is entered into for the following reasons:

2 1. Counsels for the defendants need additional time to review discovery, conduct
3 investigation in this case, and prepare for trial.

4 2. Defendant Spar Bilicki is incarcerated and does not object to this continuance. Defendant
5 Brenda Contreras is out of custody and does not object to the continuance.

6 3. The Parties agree to this continuance.

7 4. The additional time requested herein is not sought for purposes of delay, but rather to
8 allow counsel for the defendants' sufficient time to complete investigation.

9 5. The parties further agree that the circumstances presented above are factors for delay
10 under Section 3161(h)(7)(B)(i) through (iv), and that all delay resulting from any continuance
11 granted pursuant to this Stipulation is excluded from the computation of time by which trial must
12 commence under the statute of limitations by virtue of Title 18, United States Code, Section
13 3161 (h)(7)(A), the ends of justice outweighing the interests of the public and the defendant in a
14 speedy trial when considering the factors under Title 18, United States Code, Sections
15 3161(h)(7)(B)(i) through (iv).

16 6. This is the Third request for continuance.

17 DATED this 19th day of October, 2021.

18 Respectfully submitted,

19 CHRISTOPHER CHIOU
20 United States Attorney

21 /s/ Allison Reese
22 ALLISON REESE
Assistant United States Attorney

RENE L. VALLADARES
Federal Public Defender

/s/ Raquel Lazo
RAQUEL LAZO
Counsel for Spar Bilicki

/s/ Maysoun Fletcher
MAYSOUN FLETCHER
Counsel for Brenda Contreras

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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 SPAR BILICKI ET AL,

16 Defendant.

Case No. 2:21-cr-00102-JCM-VCM

**FINDINGS OF FACT, CONCLUSIONS
OF LAW AND ORDER**

17 **FINDINGS OF FACTS**

18 Based upon the pending stipulation of the parties, and good cause appearing therefore, the
19 Court finds that:

20 1. Counsels for the defendants need additional time to review discovery, conduct
21 investigation in this case, and to prepare for trial.

22 2. Defendant Spar Bilicki is incarcerated and does not object to this continuance. Defendant
23 Brenda Contreras is out of custody and does not object to the continuance.

24 3. The Parties agree to this continuance.

25 4. The additional time requested herein is not sought for purposes of delay, but rather to
26 allow counsel for the defendants' sufficient time to complete investigation.

5. The parties further agree that the circumstances presented above are factors for delay
under Section 3161(h)(7)(B)(i) through (iv), and that all delay resulting from any continuance
granted pursuant to this Stipulation is excluded from the computation of time by which trial must

1 commence under the statute of limitations by virtue of Title 18, United States Code, Section
2 3161 (h)(7)(A), the ends of justice outweighing the interests of the public and the defendant in a
3 speedy trial when considering the factors under Title 18, United States Code, Sections
4 3161(h)(7)(B)(i) through (iv).

5 **CONCLUSIONS OF LAW**

6 For all of the above-stated facts, the Court finds that the ends of justice outweigh the
7 interests of the public and the defendant in a speedy trial when considering the factors under 18
8 U.S.C. §3161(h)(7)(B)(i) and (iv) since the failure to grant said continuance would likely result
9 in a miscarriage of justice. As a result, any and all delay resulting from the date of entry of this
10 Order until the date set for trial below, is excludable from the computation of time by which trial
11 must commence under the Speedy Trial Act by virtue of 18 U.S.C. §3161(h)(7)(A).

12 **ORDER**

13 IT IS HEREBY ORDERED that the parties herein shall have to and including
14 November 8, 2021, to file any and all pretrial motions and notices of defense.

15 IT IS FURTHER ORDERED that the parties herein shall have to and including
16 November 22, 2021, to file any and all responsive pleadings.

17 IT IS FURTHER ORDERED that the parties herein shall have to and including
18 November 28, 2021, to file any and all replies to dispositive motions.

19 Dated October 22, 2021.

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25 HONORABLE JAMES C. MAHAN
26 UNITED STATES DISTRICT JUDGE